

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: :
GOL LINHAS AÉREAS INTELIGENTES S.A., : Chapter 11
et al.,¹ : Case No. 24-10118 (MG)
Debtors. : (Jointly Administered)

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**FOURTH SUPPLEMENTAL DECLARATION OF KATHRYN A. COLEMAN
ON BEHALF OF HUGHES HUBBARD & REED LLP**

I, Kathryn A. Coleman, under penalty of perjury, declare as follows:

1. I am a partner and co-chair of the Corporate Restructuring Department of the firm of Hughes Hubbard & Reed LLP (“Hughes Hubbard” or the “Firm”), an international law firm with principal offices at One Battery Park Plaza, New York, New York 10004. I am admitted to practice and am a member in good standing of the bar of the State of New York.

2. I submit this declaration (the “Fourth Supplemental Declaration”) to supplement the (i) *Declaration of Kathryn A. Coleman in Support of Debtors’ Application for Entry of an Order Authorizing the Employment and Retention of Hughes Hubbard & Reed LLP as Co-Counsel to the Debtors Effective as of the Petition Date* [Docket No. 159, Ex. B] (the

1. The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GOL Linhas Aéreas Inteligentes S.A. (N/A); GOL Linhas Aéreas S.A. (0124); GTx S.A. (N/A); GAC, Inc. (N/A); Gol Finance (Luxembourg) (N/A); Gol Finance (Cayman) (N/A); Smiles Fidelidade S.A. (N/A); Smiles Viagens e Turismo S.A. (N/A); Smiles Fidelidade Argentina S.A. (N/A); Smiles Viajes y Turismo S.A. (N/A); Capitânia Air Fundo de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); Sorriso Fundo de Investimento em Cotas de Fundos de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); and Gol Equity Finance (N/A). The Debtors’ service address is Praça Comandante Linneu Gomes, S/N, Portaria 3, Jardim Aeroporto, 04626-020 São Paulo, São Paulo, Federative Republic of Brazil.

“Original Declaration”);² (ii) *Supplemental Declaration of Kathryn A. Coleman on Behalf of Hughes Hubbard & Reed LLP* filed on March 7, 2024 [Docket No. 237] (the “First Supplemental Declaration”); (iii) *Second Supplemental Declaration of Kathryn A. Coleman on Behalf of Hughes Hubbard & Reed LLP* filed on May 1, 2024 [Docket No. 561] (the “Second Supplemental Declaration”); (iii) *Third Supplemental Declaration of Kathryn A. Coleman on Behalf of Hughes Hubbard & Reed LLP* filed on June 27, 2024 [Docket No. 745] (the “Third Supplemental Declaration” collectively with the Original Declaration, the First Supplemental Declaration, and Second Supplemental Declaration, the “Prior Declarations”). On March 11, 2024, the Court entered the *Order Authorizing the Employment and Retention of Hughes Hubbard & Reed LLP as Co-Counsel to the Debtors Effective as of Petition Date* [Docket No. 252].

3. Unless otherwise stated in this Fourth Supplemental Declaration, I have personal knowledge of the facts set forth herein and, if called as a witness, I would testify thereto. Certain of the disclosures set forth herein relate to matters not within my personal knowledge but rather within the knowledge of other attorneys and employees at Hughes Hubbard and are based on information provided to me by them.

4. As previously noted, Hughes Hubbard has reviewed and will review its files periodically during the pendency of these Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances arise. If any new relevant facts or relationships are discovered or arise, Hughes Hubbard will use reasonable efforts to identify such developments and will promptly file a supplemental declaration, as required by Rule 2014(a) of the Federal Rules of

2. Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Original Declaration.

Bankruptcy Procedure and Rule 2014-1(a) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York.

5. Since the Petition Date, Hughes Hubbard has continued to update its conflicts searches as it learns of additional parties in interest in the Chapter 11 Cases. Azul S.A. (“Azul”) has filed a notice of appearance in the Chapter 11 Cases. Hughes Hubbard conducted a search of its electronic database for its connections to Azul. Hughes Hubbard determined that an affiliate of Azul is a former client of the Firm in matters unrelated to the Chapter 11 Cases. This affiliate of Azul accounted for less than one tenth of one percent of Hughes Hubbard’s gross revenues for the years ending respectively December 31, 2022 and December 31, 2023. Hughes Hubbard does not presently, has not in the past, and will not during the pendency of the Chapter 11 Cases, represent Azul or any of its affiliates in connection with the Debtors. Hughes Hubbard does not have, to my knowledge, any current relationship with Azul or any of its affiliates which would be adverse to the Debtors or their respective estates.

6. Based upon the internal review, Hughes Hubbard believes that it is a “disinterested person,” as such term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, and, as required by section 327(a) and referenced by section 328(c) of the Bankruptcy Code, neither holds nor represents any interest adverse to the Debtors or their estates, in that Hughes Hubbard, its partners, counsel, and associates:

- (a) are not creditors, equity security holders, or insiders of the Debtors;
- (b) are not and were not, within two years before the date of the filing of the Debtors’ chapter 11 petitions, a director, officer, or employee of the Debtors; and
- (c) do not hold or represent any interest that is materially adverse to the interests of the Debtors’ estates, or any class of creditors or equity security

holders of the Debtors, by reason of Hughes Hubbard's direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason, other than as set forth herein.

7. Subject to the foregoing, to the best of my knowledge, neither I, Hughes Hubbard, nor any partner, counsel, or associate of Hughes Hubbard has any material connection with the Debtors, their creditors, the United State Trustee or any of its employees, any other party in interest, or their respective attorneys or accountants in these Chapter 11 Cases, except as set forth in this Fourth Supplemental Declaration or the Prior Declarations.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 28, 2024

/s/ Kathryn A. Coleman
Kathryn A. Coleman